



The Soap and Detergent Association

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TESTIMONY of  
THE SOAP AND DETERGENT ASSOCIATION

*regarding*

CONNECTICUT HOUSE BILL 6496

*“An Act Concerning Green Cleaning Products in Schools”*

*before the*

COMMITTEE on EDUCATION

STATE of CONNECTICUT

February 23, 2009

## **Introduction and Overview**

The Soap and Detergent Association (SDA) is pleased to provide testimony concerning the referenced measure. SDA is a one-hundred plus member trade association representing the \$30 billion U.S. cleaning products market. SDA members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers.

SDA and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. Our mission is to support the sustainability of the cleaning product and oleochemical industries through research, education, outreach and science-based advocacy. Founded in 1926, a major component of the SDA mission has been the promotion of improved health through personal hygiene and effective cleaning. This testimony will outline SDA comment on the legislative intent, association experience with similar programs, and SDA recommendations for the State of Connecticut going forward.

### **SDA Is Engaged in Promoting Cleaning and Health**

Ensuring human health and environmental safety are significant priorities for SDA members. Sound, technical research has demonstrated the safe and beneficial use of cleaning products and their ingredients when properly used. Over the course of their history, SDA members have innovated and introduced new and better technologies. The health benefits of cleaning products are undisputed. The historical correlation between improved personal hygiene and reduced infant mortality rates and disease reduction are well established. SDA works closely with the Centers for Disease Control and Prevention (CDC) and many other public and private entities in promoting public health.

As a working example of SDA's commitment to healthy people and their environments, the association works in cooperation with the CDC on the "*Healthy Schools, Healthy People It's a SNAP*" program. The program features an annual national contest where middle schools compete to develop the most effective program to communicate that handwashing is essential to breaking the chain of disease transmission. The SDA and CDC work together to bring the winning school to Washington, DC for an award presentation.

SDA has also teamed-up with the National Education Association (NEA) Health Information Network and the CDC to create the National C.L.E.A.N.<sup>TM</sup> Award. SDA announced its participation in the award program at the ISSA/INTERCLEAN® North America show in Las Vegas: *C.L.E.A.N. - Custodial Leaders for Environmental Advocacy Nationwide*, will recognize the contributions that custodians make to public health in their schools, communities, and their profession.

More information on both of these collaborative programs, SDA sustainability efforts, as well as many other initiatives, including information on the cleaning products industry can be found at [www.cleaning101.com](http://www.cleaning101.com).

### **SDA Is Substantively Engaged on Environmentally Preferable Procurement Policy Issues**

SDA and its members have participated in several activities with national impact. These include participation in the development of "*Stewardship for the Cleaning of Commercial and Institutional Buildings*" by the American Society for Testing and Materials (ASTM) International. The guide assists owners and operators of commercial and institutional buildings in the stewardship of cleaning and

housekeeping operations. It maximizes eco-efficiency and is designed to minimize adverse impacts on building occupants, cleaning personnel, the building structure itself, and the environment.

SDA is working with the U.S. EPA's Design for the Environment (DfE) program and in particular, the *Green Formulation Initiative*. In addition, SDA has worked with the EPA on drafting its *Guidance on Environmentally Preferable Purchasing*. It is the aim of SDA to achieve the application of sound science. SDA members take pride in formulating safe and efficacious products, and in that regard, the efficacy of cleaning products should be an element for any consideration criteria.

SDA encourages a flexible approach that takes into consideration market-based approaches and solutions that address environmental and consumer issues, among others. The most-widely recognized environmentally preferable purchasing definition is contained in Executive Order 13101 (1998). This definition states that "*products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service.*" SDA urges the State of Connecticut to strongly consider this nationally-based and durable definition.

An important element in any effective green cleaning program is to accurately gauge claims. A buyer wants to have confidence in the product they are getting. The U.S. Federal Trade Commission (FTC) publishes official guidelines for environmental marketing claims, to among other things, review the claims made for consumer products. The FTC issues "*Guides for the Use of Environmental Marketing Claims*" and these outline principles that apply to all environmental marketing claims – including important environmentally preferable product claims.

#### **SDA Working Comments on HB 6496**

Among other goals, the intent of HB 6496 is to enable each local and regional board of education to implement a green cleaning program for the cleaning and maintenance of school buildings and facilities in its district. SDA recommends a state-level template: it is of the utmost importance to avoid a patchwork-quilt of rules and requirements; individual local or regional action will only strain already limited budgets.

Section 1 of HB 6496 would enact new provisions to prohibit the use of cleaning products inside a school unless such cleaning products meet the standards set by a certified independent third party. As discussed above, SDA would instead point to the efforts of the U.S. Environmental Protection Agency's Design for the Environment program for consideration by the State of Connecticut. Of note with regard to third party entities, SDA has commented to Green Seal, Inc. on several standards proposals and has urged the organization to consider criteria beyond simply hazard-based approaches. SDA is not aware of any data that shows that Green Seal™ standards have led to real and measurable environmental improvements. SDA would also note that, in general, such standards can provide a set of stagnant criteria that do not change with time and ignore progress in technology and innovation. It is the aim of SDA to achieve the application of sound science (e.g. a "risk-based" approach) to making purchasing decisions, and to maintain clarity in the possible development of any environmentally preferable requirements or criteria, and the flexibility to recognize innovation.

In Section 2 of the measure, Connecticut law would be amended so that the named entities "*shall adopt and implement a green cleaning program . . . that provides for the procurement and use of environmentally preferable cleaning products in school building and facilities.*" As a matter of general concern and interest, SDA encourages a flexible approach taking into consideration market-based

approaches and solutions that address environmental and consumer issues, among others. SDA strongly urges a reasonable course in the development of any potential guidelines that may be considered or developed under this legislation or future regulatory activity. SDA is committed to serve as a resource to the State of Connecticut at any and all stages of the process.

### **SDA Recommendations on Environmentally Preferable Procurement**

As a succinct summation to the considerations noted above, SDA recommends the following:

1. The application of a risk-based ingredient and product assessment scheme to take both hazard and exposure issues into consideration;
2. Environmental and health benefits should be based on all stages of a product life cycle;
3. Purchasing decisions should be based on consideration of environmental factors *plus* price *plus* performance;
4. Pollution prevention should be considered at all stages of the process;
5. Relative environmental impacts should be compared; *and*
6. Accurate and meaningful information should be utilized in procurement decisions.

### **Conclusion**

SDA appreciates the opportunity to provide testimony to the State of Connecticut on this legislation. SDA is the association for cleaning products, and stands ready to serve as a resource to any state-based entity in this regard. Human health and environmental safety are significant priorities for SDA members, and throughout its history, the association's sound, technical, risk-based research has demonstrated the safe, beneficial, and proper use of cleaning products and their ingredients. In cases where the impacts were of concern, SDA members adapted and innovated, introducing new and better technologies and ingredients to mitigate environmental effects.

For future reference, please contact Douglas Troutman, Director of Government Affairs at (202) 662-2508 or via electronic mail at [dtroutman@sdahq.org](mailto:dtroutman@sdahq.org).